McDonald's Corporation
International Franchisee Privacy Statement

Last Updated: 24 April 2025

1. Introduction

McDonald's Corporation, 110 N. Carpenter Street, Chicago, Illinois 60607, USA (referred to as "**McDonald's**", "**we**", "**us**" or "**our**" in this Statement), is committed to protecting the privacy and security of the information that we collect and use for franchise-related purposes and for the administration of our franchise-related function.

This Statement (referred to as the "**International Franchisee Privacy Statement**" or "**Statement**") explains how McDonald's manages the personal information of our franchisees outside of the U.S. and of franchisees of our subsidiaries outside of the U.S. (including developmental licensees; collectively, "**McDonald's Franchisees**"), and individuals employed by or affiliated with McDonald's Franchisees.

Please note that nothing in this Statement limits the rights you may have under your local data protection law.

2. Scope

This Statement applies to any prospective, current or former McDonald's Franchisee or a "**Franchisee Employee**," which means (1) an individual formerly or currently employed by a McDonald's Franchisee, (2) a contractor and consultant who was or is not formally an employee of a McDonald's Franchisee, and/or (3) another individual who was or is affiliated with a McDonald's Franchisee, including but not limited to an individual who directly or indirectly holds shares of a McDonald's Franchisee or an owner of a McDonald's franchise restaurant.

Please note that the scope of this Statement is limited to information provided to McDonald's as part of the franchise relationship. This Statement does not cover personal information provided directly by the McDonald's Franchisee or Franchisee Employee to third parties or personal information held by the McDonald's Franchisee that is not collected, managed or accessed by McDonald's.

3. Who is the Data Controller

For the purposes of this Statement, McDonald's Corporation is the data controller of your personal information.

4. Information we Collect and Process and the Legal Basis for the Processing

This Statement applies to personal information (i.e., any information relating to an identified or identifiable natural person) of McDonald's Franchisees and Franchisee Employees. We process this information which we collect or which is otherwise provided to us in writing, electronically or orally as part of our role as a franchisor or parent of the applicable franchisor in order to provide certain services and support to franchisees to achieve the purposes set out below under "How we Use your Information". We do so on the basis of the necessity for compliance with a legal obligation to which McDonald's is subject, the performance of a contract to which the McDonald's Franchisee or Franchisee Employee is party or on the basis of our prevailing legitimate interest to efficiently and effectively provide such services and support. Depending on your role and the nature of the services we provide to the relevant McDonald's Franchisee, this information may include:

- Contact information such as your name, telephone number (home and mobile), home address and email address;
- Your gender or date of birth;
- Information relating to your role, such as your date of hire/termination, title/position, grade and department, work-related contact and location details, preferred language, manager details, certifications and training courses attended,
- Information on the shareholder structure of the relevant McDonald's Franchisee, including information necessary to comply with applicable anti-money laundering and trade sanction-related requirements.
- User names, login details, passwords and other unique identification numbers, whether assigned by McDonald's or selected by you as well as access privileges, account validity and security settings; and

- Electronic content produced or received by you using McDonald's IT systems, including documents, information, and emails and other electronic communications transmitted or received through the use of McDonald's IT systems.
- Information on the franchise agreement concluded with the relevant McDonald's Franchisee ("**Franchise Agreement**"), including commercial terms, legal terms and any other contractual documentation, information about contract performance, instances of non-performance and information about the expiration and termination of the Franchise Agreement.
- Accounting and payment information such as VAT number, country, bank account, name of the account holder, bank category, reference details, SWIFT code, IBAN, bank name and address, terms of payment, accounting correspondence.
- McDonald's Franchisee application data such as financial data, CVs of key personnel including direct and indirect shareholders, background check including criminal background check, and publicly available information.
- Financial data and performance-related data (to the extent it qualifies as personal data) of the relevant McDonald's Franchisee.
- Real-estate related data, which may incidentally include personal data.
- Financial records, quality assurance and quality control documents and other information relevant for an audit, which may incidentally include personal data.
- Publicly available data such as social media posts.

Depending on your role and the relevant circumstances, we may collect the following personal information on the basis of your consent:

- For purpose of training Franchisee Employees, depending on the market: your manager and alternate manager, employee type (regular, intern, temporary), date of contract termination, gender, contact details, department, information about the status of the training courses and the date of their completion as well as any test scores, technical data in relation to your usage of the training platform and the device, system and software and peripherals from which you are accessing the platform.
- If you are a owner of a McDonald's franchise restaurant and only in order to ensure diversity, equity, and inclusion within the McDonald's franchise network, information on race and ethnicity, religious or philosophical beliefs, sexual orientation, disability status.

5. Purposes for Which Your Personal Information is Processed

We use your personal information for a number of purposes associated with the management of the franchise relationship (including the provision of optional services requested by the relevant McDonald's Franchisee):

- The administration and oversight of the franchise relationship (e.g., financial and performance-based reporting);
- The provision and facilitation of access to McDonald's and McDonald's third party service provider's systems and applications utilized during the course of the franchise relationship (including identity and access management or in-restaurant technologies such as NewPOS);
- Increasing productivity and/or efficiency, e.g. by training and using appropriate AI tools, including large language models;
- Monitoring the security and use of our networks, communications and systems, offices and facilities, property and infrastructure, and information security services optionally offered to franchisees;
- Reporting and statistical analysis (e.g., system usage, content access, transactional level detail);
- Optional services offered by McDonald's and various learning platforms such as FRED/CAMPUS;
- Compliance with legal obligations, including record-keeping and reporting obligations;
- Dispute and complaint resolution, internal investigations and reviews, auditing, regulatory and legal compliance, compliance with internal policies, and risk management, including compliance with anti-money laundering and trade sanction-related requirements;
- Establishing, exercising or defending against legal claims;
- To assess a potential McDonald's Franchisee's suitability as a franchisee as part of our franchise due diligence process;
- Quality management and audits;
- Global management of basic restaurant data and hierarchies (General Business Location);
  Improvement of the restaurant operation process of the relevant McDonald's Franchisee

How your information will actually be used will depend on the applicable law in the jurisdiction at issue which may place certain requirements on the collection, use and disclosure of this information.

6. How We Disclose and Share your Information

In order to achieve the purposes set out further above, your information may be shared with other affiliates and subsidiaries of McDonald's (the "**McDonald's Group**") and the relevant McDonald's Franchisee.
Your information may also be shared with various third parties outside of the McDonald's Group for the purposes set out further above. These third parties may include:

- Third party service providers, including suppliers, subcontractors and consultants that provide services to McDonald's or a McDonald's Group company;
- Government authorities, including regulatory authorities, law enforcement, or public entities such as local tax authorities

We may also share information with third parties when:

- We believe in good faith that the disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process and such disclosure is in compliance with local law;
- In the event of a merger or acquisition, asset sale, a transfer of some or all of McDonald's business, or other related transaction; and
- When we believe in good faith that disclosure is required by law or to protect the safety of our employees, McDonald's Franchisees, Franchisee Employees, the public or McDonald's property.

7. International Data Transfers

Like many global businesses, we have both centralized and outsourced various aspects of our business to improve how we manage and administer our franchise relationships. As a result, and in order to fulfill the purposes described in this Statement, it may be necessary to transfer your information to a country outside of the country where it was originally collected or outside of your country of residence. These transfers may be to any McDonald's Group company around the world (as required) as well as to third party service providers that help McDonald's manage and administer its franchise relationships.

If we are subject to the EU General Data Protection Regulation (GDPR), we only transfer your personal information to a non-EU/EEA country or within the U.S. where we have established or confirmed that all data recipients will provide an adequate level of data protection, in particular by way of entering into appropriate data transfer agreements based on Standard Contractual Clauses (e.g., Commission Implementing Decision (EU) 2021/914) and other suitable measures, which are accessible from us upon request.

With respect to data transfers to the US from certain European jurisdictions, these transfers are subject to the EU-U.S. Data Privacy Framework, the U.K. Extension to the European Union-U.S. Data Privacy Framework, and the Swiss-U.S. Data Privacy Framework (collectively, "**DPF Principles**"). To the extent we receive EU human resources personal information of McDonald's Franchisees and Franchisee Employees, we are committed to subjecting such information to the DPF Principles or the contractual provisions of the SCCs, as applicable. In compliance with the DPF Principles, McDonald's commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities, the UK Information Commissioner's Office, and the Swiss Federal Data Protection and Information Commissioner (collectively, "**DPAs**") with regard to unresolved complaints concerning our handling of human resources personal information received in reliance on the EU-U.S. DPF in the context of the employment relationship. If there is any conflict between the terms in this Statement and the DPF Principles, the DPF Principles shall govern. To learn more about the DPF Principles, visit the U.S. Department of Commerce's Data Privacy Framework List here.

For more information see the Data Privacy Framework Notice at the end of this International Franchisee Privacy Statement.

8. Security

We have in place appropriate technical, physical and organizational security measures that are designed to protect against unauthorized access, disclosure, damage or loss of personal information. The collection, transmission and

storage of information can never be guaranteed to be completely secure. However, we take steps to ensure that appropriate security safeguards are in place to protect your information.

9. Retention

Unless a specific retention period is mandated or permitted under applicable law, McDonald's will only retain your personal information for the duration of time necessary to fulfill the purposes described in this Statement. This means that, in some cases, we may retain your personal information for a period of time following termination of your relationship with McDonald's (whether as a McDonald's Franchisee or a Franchisee Employee), in particular where potential legal claims are not yet time-barred.

10. Choice, Access, and Other Rights

Under applicable law, you may have the rights (under the conditions and to the extent set out in applicable law): (i) to check whether and what kind of personal information we hold about you and to access or to request copies of such data; (ii) to request correction, supplementation, anonymization, blocking or deletion of information about you that is inaccurate, incomplete, outdated, unnecessary, excessive or processed in non-compliance with applicable requirements; (iii) to request the restriction of the collection, processing or use of information about you; (iv) in certain circumstances, to object for legitimate reasons to the processing of your information or to revoke consent previously granted for the processing while the latter does not affect the lawfulness of processing before the revocation; (v) to request data portability; and (iv) to lodge a complaint with the competent authority.

11. How to Contact Us

If you have any questions or concerns in relation to the collection and management of your information by McDonald's under this Statement, please contact us at:

- By email: contact.privacy@us.mcd.com
- By post: McDonald's Corporation
  Attn: Global Data Protection Office
  Privacy at McDonald's, Dept. 282
  110 North Carpenter Street
- Chicago, IL 60607-2101, USA

12. Changes to this Statement

From time to time we may change, modify or amend this Statement in order to comply with the evolving regulatory environment or the way we operate our business. Subject to any applicable legal requirements to provide additional notice and/or obtain consent, any changes to this Statement will be communicated to you through existing McDonald's communication channels and resources.

Data Privacy Framework (DPF) Notice
EU-U.S. DPF, UK Extension to the EU-U.S. DPF, and Swiss-U.S. DPF

McDonald's Corporation and McDonald's Global Markets LLC, a wholly-owned subsidiary, participate in in and comply with the EU-U.S. Data Privacy Framework ("**EU-U.S. DPF**"), the UK Extension of the EU-U.S. DPF ("**UK-EU DPF**"), and the Swiss-U.S. Data Privacy Framework ("**Swiss-U.S. DPF**") (collectively, "**DPF**") as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information from European Union member countries, the United Kingdom, and Switzerland. For the purposes of this DPF notice only, McDonald's Corporation and McDonald's Global Markets LLC are each and individually and collectively referred to as "McDonald's." To review a list of DPF participants and McDonald's DPF certification, click here.

You have the right to request access to personal information received by McDonald's in reliance on the DPF, and to exercise choice in limiting McDonald's use and disclosure of such information, including with respect to disclosures of such information to third parties and using the information for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized by the individuals. McDonald's may use third-party service providers to assist McDonald's with processing the personal information subject to the International Franchisee Privacy Statement. McDonald's may be liable under the DPF if these service providers process such personal information in a manner inconsistent with the DPF and McDonald's is responsible for the event giving rise to the damage.

McDonald's commitments under the DPF are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. McDonald's may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

You may contact McDonald's with questions, concerns or complaints relating to McDonald's participation in the DPF by sending an email to contact.privacy@us.mcd.com. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, McDonald's commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities, the UK Information Commissioner's Office, and the Swiss Federal Data Protection and Information Commissioner with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship. For information on how to contact the DPA in your country, click here. For information regarding the Swiss DPA, click here. McDonald's commits to cooperate with your country's DPA and any panel established by the DPAs, and to comply with the advice they provide with respect to the personal information subject to the Franchisee Privacy Statement that McDonald's receives in the U.S.. In certain conditions, you may have the right to invoke binding arbitration.